June 14, 2000

Ms. Brenda Pohlmann Remediation Branch Supervisor Nevada Division of Environmental Protection 555 E. Washington, Suite 4300 Las Vegas, NV 89101

Dear Ms. Pohlmann:

Subject: Perchlorate Activity Status

Following is the current status of Kerr-McGee Chemical LLC's (Kerr-McGee) activities regarding the perchlorate issue:

- Kerr-McGee's commitment to remove perchlorate from surfacing groundwater, or the "seep", is continuing, utilizing Calgon Carbon's ion exchange process. During May 2000, 9.25 tons of perchlorate was removed from the surface stream before it entered the wash. To date, 29 tons have been removed since ion exchange operation began in November 1999. The stream flow is down, nominally 320 gpm, and perchlorate concentration is up, averaging 85 to 90 ppm. These conditions appear typical of summertime conditions in the stream. Although the ion exchange system is running well, we continue to have occasional operational difficulties due to the Clark County earthen dam, installed upgradient from the stream capture point. Kerr-McGee is hopeful that this dam will be removed at the earliest possibility.
- On-site groundwater continues to be extracted and treated for chromium removal, then placed in the on-site groundwater holding basin for eventual treatment for perchlorate removal. Since initiation of impoundment in December 1998, considering the average perchlorate concentration of 1200 to 1900 ppm, 158 tons of perchlorate have been removed from the on-site groundwater. The holding basin has had a very high evaporation rate due to lower than normal rainfall and above average temperature and wind conditions.
- ❖ Kerr-Gee is continuing transfer of groundwater extracted from the Pittman Lateral area to its groundwater holding basin. We are utilizing a tanker truck to accomplish this. Over the 218 days this transfer has been active, approximately 1.46 tons of perchlorate have been removed from the groundwater.
- ❖ NPDES Discharge Permit NDEP, Bureau of Water Pollution Control is developing a discharge permit for perchlorate treated waters. Towards that end, Kerr-McGee filed an NPDES permit application with NDEP in later 1999. A draft permit was developed and has been issued for public notice by NDEP. Until the NPDES permit is approved for use, Kerr-McGee has continued seep stream perchlorate removal, under the authorization of a Temporary Discharge Permit.
- Engineering (currently being completed by Biothane Corporation and Applied Research Associates) is nearing completion on the biological treatment system for perchlorate. The cost estimate and schedule are expected by end of June for Kerr-McGee internal review and approval. Pre-construction activities, such as site preparation, have begun in the Henderson Plant. Additional activities are pending a grading permit, currently in Clark County Planning and Zoning's control. This permit is pending a review

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> and resultant approval letter from NDEP to continue the grading permit review process. Documents (drawings) have been submitted to NDEP's Las Vegas office for this review process. Additional information will be forwarded, as it is available. It is expected that a year will be needed to construct the biological treatment facility once internal approval and NDEP permits and approvals have been received.

Private Property Pipeline Easement Agreements - These are under development. At this time, none are expected to cause a construction delay.

KMC is committed to act responsibly and cooperate fully with local, state, and federal officials in determining appropriate remedial actions. Please feel free to contact me at (702) 651-2200 if you have any questions related to this information. Thank you.

Sincerely.

Suchowley Susan M. Crowley

Staff Environmental Specialist

By certified mail

PSCorbett

EMSpore

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Jeanne-Marie Bruno, Metro Water District Of Southern California

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